

Voinovich *for Senate*

2003 SEP -8 A 10: 25

August 25, 2003

AOR 2003-26

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

In re: Request for Advisory Opinion
Voinovich for Senate

Commissioners:

An investigation by the United States Attorney for the Northern District of Ohio, revealed improper or illegal campaign contributions from a corporation, its officers, and employees. The United States Attorney specifically found that, "no wrongdoing [had]. . . been found on the part of any recipient political candidate or political committee." The United States Attorney, nonetheless, identified the contributions that had been improper and identified the campaign committees that had received the contributions and the amount of those contributions.

Voinovich for Senate, the principal campaign committee of Senator George V. Voinovich, was the recipient of campaign funds from these sources and in 2002 voluntarily returned the improper contributions to the court appointed Liquidator of the subject corporation in full reimbursement of the identified contributions.

Voinovich for Governor was the political campaign committee authorized under the laws of the State of Ohio for then Governor (now Senator) George Voinovich. Voinovich for Governor concluded its activities in 1998, filed all of its required reports, and terminated its existence with a zero balance.

In the event that it is discovered that the Voinovich for Governor committee was the recipient of improper contributions, please provide your advisory opinion to the following question:

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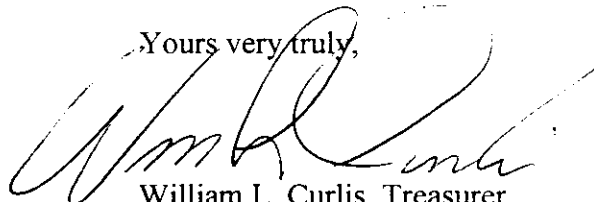
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May the funds of a federal principal campaign committee be used to refund campaign contributions received by a state campaign committee when the state campaign contributions have subsequently been found to be improper and when the state campaign committee no longer exists and has no assets with which to refund such contributions?

If you require further detail or amplification of the facts of this question, please contact me.

Thank you for your cooperation in this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read 'William L. Curlis', written over a horizontal line.

William L. Curlis, Treasurer
Voinovich for Senate